

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

|  |   |                                    |
|--|---|------------------------------------|
| WALTON TENNESSEE, LLC, <i>et al.</i> , | ) |                                    |
|  | ) |                                    |
| <i>Plaintiffs,</i>                     | ) |                                    |
|  | ) |                                    |
| v.                                     | ) | Civil Action No. 3:24-cv-01308     |
|  | ) |                                    |
| JONATHAN SKRMETTI, in his official     | ) | District Judge Eli J. Richardson   |
| capacity as the Tennessee Attorney     | ) | Magistrate Judge Barbara D. Holmes |
| General & Reporter, <i>et al.</i> ,    | ) |                                    |
|  | ) |                                    |
| <i>Defendants.</i>                     | ) |                                    |

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**NOTICE OF VOLUNTARY DISMISSAL**

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Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), Plaintiffs Walton Tennessee, LLC (“Walton Tennessee”); Stephen Misch, individually and as beneficiary and trustee of the Misch, Stephen John Burrus Ridge Revocable Trust; Jason Vance, individually and as beneficiary and trustee of the Vance, Jason Floyd Burrus Ridge Revocable Trust and as beneficiary and trustee of the Vance, Jason Floyd Cane Ridge Landing Revocable Trust; and Alessandro Silvestroni, individually and as beneficiary and trustee of the Silvestroni, Alessandro Burrus Ridge Revocable Trust and as beneficiary and trustee of the Silvestroni, Alessandro Cane Ridge Landing Revocable Trust, hereby submit this Notice of Voluntary Dismissal of this action.

Defendants have made clear to Plaintiffs and this Court that Public Chapter 995 of the Tennessee Public Acts of 2024 (the “Act”) does not apply to land interests acquired before January 1, 2025, by the Plaintiffs and Walton Tennessee’s principals. Defendants have stated unambiguously that “the divestment, escheatment, and criminal provisions of the Act do not apply to land holdings acquired by [Plaintiffs and Walton Tennessee’s principals] before January 1,

2025,” Dkt. 31 at 14, because these provisions of the Act “appl[y] prospectively,” *id.* at 42. Defendants concluded that “[f]or [Plaintiffs and Walton Tennessee’s principals] holding interests in land that w[as] acquired before January 1, 2025, there is no threat of escheatment to the State under the Act.” *Id.* at 30.

Defendants have not served an answer or a motion for summary judgment in this action. *See* Fed. R. Civ. P. 41(a)(1)(A)(i). Under Rule 41, this dismissal is without prejudice. *See id.* 41(a)(1)(B). Plaintiffs reserve the right to renew this action if Defendants attempt to enforce the Act against Plaintiffs, including Walton Tennessee and its principals.

Dated: December 31, 2024

Respectfully submitted,

/s/ Connor M. Blair

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*Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on December 31, 2024, a true and correct copy of the foregoing has been served on counsel below for all Defendants through operation of the Court's electronic filing system and, by agreement with counsel for Defendants, email:

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